



**Fw: PCB Contamination in SLC Utah (EPA Region 8)(FYI)**

Daniel Duncan to: Bruce Long  
Cc: Tristen Gardner

03/02/2010 10:53 AM

From the Desk Of:

Daniel Duncan

Office of Compliance and Enforcement

(206) 553-6693

(206) 553-1775(FAX)

----- Forwarded by Daniel Duncan/R10/USEPA/US on 03/02/2010 10:31 AM -----

From: "Ame LeCocq" <AmeL@orrco.biz>  
To: Kim Le/R8/USEPA/US@EPA, Daniel Duncan/R10/USEPA/US@EPA, "Christopher Harris Attorney" <gallating@aol.com>, "Bill Briggs" <BillB@orrco.biz>  
Date: 03/02/2010 10:21 AM  
Subject: PCB Contamination in SLC Utah

\*\*\*\*\*  
Dear Kim:

I am forwarding you all of the information I have on the source of the contamination.

1. On Friday, February 26, 2010, I instructed our Utah driver, Thorpe Cox to take another employee of ours, Mr. Gary Cox (no relation) and go back to the five customers in question that could be possible sources of the original PCB contamination. I asked these men to attempt to collect samples from the residue of each tank Thorpe had pumped on the day in question (which was January 20, 2010). They did this, and were able to get a sample from each of the 5 customers. Please see Attachment "SLC Lab Results". 4 of the potential customers, Broken Arrow Quarry, Diamond Rental, 5 Star Quick Lube, and Upper Limit Aviation all tested at less than 1ppm PCB content. The fifth customer, Burly Seal in Tooele, Utah, tested at 20,800 ppm. These results were received yesterday (3/1/10) at 3:50pm Portland time. I called Kim Le and left a voicemail notifying her of this situation.

2. I asked our driver, Thorpe Cox, to write a statement this morning and send it to me, recounting the events that occurred on Friday, 2/26/10 when he went to collect the sample from Burly Seal. See attachment "Cox Statement". I also asked him to send Gary Cox to take photographs of the totes, parking lot, etc. of this customer (I do not have these yet, but will forward them once I do).

3. I pulled the paperwork from the collection of oil in question, on January 20, 2010. See Attachment "Burly Seal 1-20-10" for this information. The invoice and bill of lading are included in this attachment. The bill of lading is signed by the generator. Our driver ran a Hydro-Chlor-D-Test test on site prior to collecting the oil, and got a result of less than 200ppm (also recorded on the bill of lading). The profile sheet was "on file" (see next paragraph for explanation).

4. Our profiling system states that if a customer's generation process does not change, then the waste material profile sheet is good for one year. When Mr. Cox went to the customer on 1/20/10, they had a valid profile on file, and stated that their generation process had not changed. He referenced this "on file" profile on his bill of lading from 1/20/10. Please see Attachment "09 On File Profile". This is the waste material profile sheet that was relied upon. This profile states that the material collected is generated "from hydraulic presses to make rubber seals. Steam during the process cross contaminates the oil with water." Nothing was mentioned about possible PCB contamination. Additionally, Section 2 is marked "used oil" and "hydraulic oil".

5. I went back into the customers file for 2008, and there was no collection of oil during that year. I then went back into our files for 2007. See Attachment "07 On File Profile". This profile also stated that the oil was generated from "presses and machines that make rubber gaskets. Hydraulic oil from presses is contaminated from steam leaks in the system {to account for the water in the mixture}. Also some air compressor oil." Again, no mention of possible PCB contamination.

Kim, we are very interested in accompanying EPA on their investigation of this company, as we will need to contact them ASAP to notify them of their obligation for financial responsibility. Would it be possible for either myself, or our corporate attorney to meet you (or whomever the investigator may be) in Utah? If not, may we know when you contact them, because after you have done this, I believe we want to make our contact with them at that time. As I'm sure you agree, time is of the essence here. I will await your advice on this topic.

I will be sending another email later today, updating everyone on the clean up efforts.

If there are any questions or concerns, please contact me.

Sincerely,

*Ame LeCocq*  
*Compliance Manager - ORRCO*  
*4150 N. Suttle Road*  
*Portland, OR - 97217*  
*ph: 503-286-8352*  
*fx: 503-286-5027*  
*amel@orrcoco.biz*



Cox Statement 1.pdf Burly Seal 1-20-10.pdf 09 On File Profile.pdf 07 On File Profile.pdf





1	Generator Name <u>Berly Seal Products</u>	Location <u>1065 W. T. Ave Bld. 604 Troy, VT 04074</u>
2		
3	<b>Generator Fills Out      Waste/Material Profile (One completed profile per product)</b>	
4	Description: Used Automotive Oil <input type="checkbox"/> DIY Used Oil <input type="checkbox"/> Machine Lubricating Oil <input checked="" type="checkbox"/> Machine Tool Cutting and/or Cooling Fluids	
5	(including used solutions) containing at least 1% petroleum <input type="checkbox"/> Hydraulic Oil <input checked="" type="checkbox"/> Brake Fluid <input type="checkbox"/> Refrigeration Oil <input type="checkbox"/> Fuel <input type="checkbox"/> <span style="float: right; font-weight: bold; font-size: 1.2em;">PROFILE</span>	
6	Oil Filters <input type="checkbox"/> Antifreeze <input type="checkbox"/> Oil Used as a Non-Contact Heat Transfer Media <input type="checkbox"/> Solvent <input type="checkbox"/>	
7	Unused Fuels and Type: Description (where and how generated) _____ <span style="float: right;">APR 25 2007</span>	
8	Water/Petroleum Mixtures: Type <u>USED OIL &amp; WATER</u> <span style="float: right; font-weight: bold; font-size: 1.2em;">APPROVED</span>	
9	Percent Water <u>50</u> % Actual Calculation <input type="checkbox"/> Process Knowledge <input checked="" type="checkbox"/> Clear Tube <input type="checkbox"/> Kolor Kut <input type="checkbox"/>	
10	Transformer Oil   PCB under 2PPM <input type="checkbox"/> PCBs under 50PPM <input type="checkbox"/> Date tested _____   Tests attached <input type="checkbox"/>	
11	Generator hereby certifies that no dilution of oil containing PCBs has occurred below any regulatory threshold :	
12	Signed: _____	
13	Oily Solids: Tank Sludge <input type="checkbox"/> Sump Sludge <input type="checkbox"/> Contaminated Soil <input type="checkbox"/> Spill Cleanup Material <input type="checkbox"/>	
14	Other (Specify) : _____      Attach all pertinent documents	
15	Solvent : Flash Point _____	
16	Has generator mixed solvent with any hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, Stop Call Supervisor	
17	For all wastes or materials, provide the following information: <u>Field Data</u>	
18	Sniffer Test Passed <input type="checkbox"/> Failed <input type="checkbox"/> Date Tested _____   Clor-D-Test Test Results <u>&lt; 30</u> PPM   Date Tested <u>4-16-07</u> PH <u>no need</u>	
19	Is Material Mixed With Hazardous Waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, Stop call Supervisor	
20	Corrosive? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Reactive? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Toxic? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Listed? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Flash Over 140°F Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
21	List All Pertinent Information ( Describe process of waste generation in detail ) Attach all Documentation	
22	including all MSDS sheets & test results; <u>Used Oil from presses and</u>	
23	<u>machines that make rubber gaskets. Hydraulic oil</u>	
24	<u>from presses is contaminated from steam leaks in system.</u>	
25	<u>Also some air compressor oil.</u>	
26		
27		
28	Name and Title of Person providing information: <u>Robert Mathen / Plant Manager</u>	
29	Facility E.P.A. REG # <u>None</u> HW Generator Status: LQG _____   SQG _____   CEG <u>X</u>	
30		
31	<b>Certification &amp; Guarantee</b>	
32	As generator of the material described in this profile (or authorized representative of the generator), I hereby certify that the information	
33	contained in this document is accurate and complete. I further certify that this material has NOT been mixed with any contaminants including,	
34	without limitation, Pesticides and waste listed or identified as hazardous waste under RCRA, or, if mixing has occurred, this material has been	
35	mixed with an ignitable-only hazardous waste in compliance with the used oil mixture rule, or C.E.G. exemption. In the event that the material	
36	described in this document is in fact hazardous waste,	
37	I hereby guarantee to pay all costs necessary for proper analysis, transportation, storage and disposal.	
38	Signed <u>Robert Mathen</u> Title <u>Plant Manager</u> Date <u>4-16-07</u>	
39		
40	<b>Receiving Facility Data</b>	
41	Is Waste/Material Acceptable for Processing?: Yes <input type="checkbox"/> No <input type="checkbox"/> Explanation: _____	
42	Accepted <input type="checkbox"/> Signed _____      Title _____      Date _____	
43	Rejected <input type="checkbox"/> Reason _____	
44	Returned to Generator? Yes <input type="checkbox"/> No <input type="checkbox"/> Transported To: _____	





Date: 3-2-10



Oil Re-Refining Company

977 South 700 West

Salt Lake City, UT 84104

Phone: 801-977-0827

Fax: 801-478-0337

To: AME LECOCQUE

From: Thorpe Cox  
Salt Lake City

Total Pages: /

Subject: Bunly Seal Statement

Gary and I stopped by Bunly Seal February 20th (Friday) and the parking lot was empty, so we figured that they were working Mon-Thurs only perhaps. The oil tote that I collected oil & water from on January 20th was still empty and hadn't had anything added to it since then. We were able to collect a small sample from the bottom of the tote that still had about 1-2" inches of oil & water by putting a PVC pipe down to the bottom and repeatedly letting the oil drip into our sample container. The tote sits outside the building on the south side in the parking lot. we didn't make contact with anyone from Bunly Seal while collecting the sample. Tote has ORRCO's used oil only collection sticker on it. There is another tote that was empty still as well, has been used previously for used oil.

Thorpe Cox





# WASTE MATERIAL PROFILE SHEET

## STEP 1: GENERATOR & SITE INFORMATION

Generator Name: Bunly Seal Products  
 Location Generated: 1865 W. P. Ave Bld. 604 Tooele, UT 84074  
 EPA ID#: None Generator Status: ☐ LQG ☐ SQG ☒ CEG

## STEP 2: WHAT IS THIS MATERIAL?

☒ Used Oil ☐ DIY Used Oil ☐ Machine Lubricating Oil ☒ Brake Fluid  
☒ Hydraulic Oil ☐ Refrigeration Oil ☐ Machine Tool Cutting Oils/Machine Coolant  
☐ Solvent ☐ Oil & Water Mixture ☐ Spent Fuel (Specify Type):  
☐ Tank Sludge ☐ Sump Sludge ☐ Spent Fuel & Water (Specify):  
☐ Contaminated Soil ☐ Spill Clean Up Material ☐ Water with Less Than 1% Petroleum Product  
☐ Fats, Oils, & Grease ☐ Spent Anti-Freeze ☐ Oil Filters ☐ Fuel Filters  
☐ Other (Specify):  
☐ Transformer Oil - PCB Less Than 2ppm (Analytical for PCB content must be attached)\*  
☐ Transformer Oil - PCB Less Than 50ppm (Analytical for PCB content must be attached)\*  
 \* Generator of Transformer Oil certifies that no dilution of PCB's has occurred below any regulatory threshold:

Signed: \_\_\_\_\_

## STEP 3: CATEGORIZING THE MATERIAL - IS THIS MATERIAL...

Corrosive: ☐ YES ☒ NO      Reactive: ☐ YES ☒ NO      Toxic: ☐ YES ☒ NO  
 Flash Over 140°F: ☒ YES ☐ NO      Mixed With Hazardous Waste? ☐ YES ☒ NO

## STEP 4: FIELD TEST RESULTS

Water Test: 10% (Obtained by: ☒ Process Knowledge, ☐ Kolor Kut, ☐ Distillation, ☐ Clear Tube)

Sniffer Test: ☐ PASSED ☐ FAILED / CLOR-D-TECT (PPM): <200 / pH: \_\_\_\_\_

## STEP 5: OTHER INFORMATION - HOW WAS THIS MATERIAL GENERATED? List All Pertinent Information (Describe process of generation in detail). Attach All Documentation, Such as MSDS and Analytical Results.

Used oil & water from hydraulic presses used to make rubber seals. Steam during process cross-contaminates oil with water.

## STEP 6: CERTIFICATION AND GUARANTEE - PLEASE READ & SIGN BELOW

As the generator of the material described above, I certify that the information contained in this document is accurate and complete. I further certify that this material has NOT been mixed with any chlorinated solvents or any other contaminants including, without limitation, PCB's, pesticides, and hazardous wastes. In the event that the material described in this document is in fact a hazardous waste, I guarantee to pay all costs necessary for proper analysis, transportation, storage, and disposal.

Printed, Full Name: John Myer / Manager

Signed: [Signature] Title: Driver Date: 6-18-09

## RECEIVING FACILITY SECTION

☐ Accepted Signed By: \_\_\_\_\_ Date: \_\_\_\_\_

☐ Rejected Tests/Explanation: \_\_\_\_\_

## For Internal Use Only:

Is this material destined for: ☐ Landfill Disposal or ☐ To Be Burned for Energy Recovery

(6)





Tel: 330.253.8211 Fax: 330.253.4489

## Analysis Request/Chain of Custody

For Summit Environmental Technologies, Inc. use only

Page 1 of 1

SET No.

Client Name		Project Name		Analytical Parameters and Methods													
Fuel Processors		January 20th Suspect Customers															
Client Address		Project Address															
4150 N. Suttle Rd. Bentham, OR 97217		ORRCD 9775. 700W. SLC, UT 84104															
Client Phone No.		Report to															
1-800-367-8894		Holly Cantin AME LECOQUE															
Client Fax No.		PO#															
801-478-0337 / 503-286-5027		AL 02 26 100															
Client Email		Quote No.															
Holly.C@ORRCD.BIZ / Thorpe.C@ORRCD.BIZ																	
Contact Person		Check if Ohio VAP samples <input type="checkbox"/>															
Holly Cantin AME LECOQUE																	
Sampled by																	
Thorpe Cox / Gary Cox																	
#	Sample Identification	Date Collected	Time Collected	Grab	Composite	Preservative	Number of Containers	PCB'S									
1	Broken Arrow 1A, 1B, 1C	2-26-10	11:20AM	X			3	X									
2	Diamond Rental (Tooele)	2-26-10	11:40AM	X			1	X									
3	Burly Seal (Tooele)	2-26-10	12:25PM	X			1	X									
4	5 Star Quicklube (Grantsville)	2-26-10	1:25PM	X			1	X									
5	Upper Limit Aviation (SLC)	2-26-10	2PM	X			1	X									
6	Tank W-27	2-26-10	3:20PM	X			1	X									

1002809-01-06

Relinquished by:	Date	Time	Received by:	Date	Time
<i>Theresa Cox</i>	<i>2-26-10</i>	<i>3:30 PM</i>			
<i>Long Ex</i>	<i>2/26/10</i>	<i>3:36</i>			
Received in lab by:	Date	Time	Rush Requested: _____ Days		
<i>John H. Smith</i>	<i>2/27/10</i>	<i>10:00 AM</i>	Must be approved by lab manager		

Notes/Comments:

\* Please send results ASAP to  
AME LECOQUE Amel@omco.biz

White and yellow pages should accompany samples to the laboratory. The client retains the pink page.

28649





## LABORATORY REPORT

March 01, 2010

1/2

Client: ORRCO  
Address: 4150 N. Suttle Road  
Portland, OR 97217

Date Collected: See Below  
Date Received: 02/27/2010  
Project #: Jan 20 Suspect  
Client ID #: See Below  
Laboratory ID #: See Below  
Matrix: Liquid  
Method: 8082  
Date of Analysis: See Below

	Lab Sample ID:	1002809-01	1002809-02	1002809-03
	Client Sample ID:	Broken Arrow	Diamond Rental	Burly Seal
	Date Collected:	02/26/2010	02/26/2010	02/26/2010
	Date Analyzed:	03/01/2010	03/01/2010	03/01/2010
PCB		<1.0ppm	<1.0ppm	20800.0ppm

Laboratory Manager: \_\_\_\_\_



## LABORATORY REPORT

March 01, 2010

2/2

Client: ORRCO  
Address: 4150 N. Suttle Road  
Portland, OR 97217

Date Collected: See Below  
Date Received: 02/27/2010  
Project #: Jan 20 Suspect  
Client ID #: See Below  
Laboratory ID #: See Below  
Matrix: Liquid  
Method: 8082  
Date of Analysis: See Below

Lab Sample ID:	1002809-04	1002809-05	1002809-06
Client Sample ID:	5 Star Quicklube	Upper Limit	Tank W-27
Date Collected:	02/26/2010	02/26/2010	02/26/2010
Date Analyzed:	03/01/2010	03/01/2010	03/01/2010
PCB	<1.0ppm	<1.0ppm	<1.0ppm

Laboratory Manager: Ad Libax







**ORRCO**  
Oil Re-Refining  
Company

Eugene, OR:	EPA#	ORQ000024941
Hoquiam, WA:	EPA#	WAD988519419
Klamath Falls, OR:	EPA#	ORD980980775
Medford, OR:	EPA#	WAH000011577
North Bend, OR:	EPA#	ORD987197092
Salt Lake City, UT:	EPA#	ORD980978266
Spokane, WA:	EPA#	UTD982589459
	EPA#	WAH000011585

226900

Date \_\_\_\_\_

Customer ID Number

1-20-10

14825

**Dispatch #:**

13730

Generator	Bunly Seal Products		Brandon Libonwood 437-578-0570	
	Name	Contact Person	Phone	
	1965 W. Dave Blvd, 604	Taovle, UT	84074	Taovle
	Address	City	State	Zip
				County

Billing Address

\*Please bill corporate  
in Dallas, Texas

Transportation	Consigned To: ORRGO		
	Destination: 9775. 700 W. SLC, UT 84104		
	Via Carrier: ORRGO, SLC		
	Driver: Thorpe	Truck # 7709	Miles F

Check#

PO#

Profile Date:

ce/18/09

Load Ticket # 10166120001

[illegible]

Above material being transported for Recycling

EPA#

None

Total:

<sup>h</sup>205.00 charge

Customer warrants that the waste petroleum products being transferred by the above collector do not contain any contaminants including, without limitation, pesticides, chlorinated solvents at concentrations greater than 1000 PPM, PCBs at concentrations greater than 2 PPM (or 50 PPM with Analytical), or any other material classified as hazardous waste by 40 CFR part 261, Subparts C and D (implementing the federal Resource Conservation and Recovery Act), or by any equivalent state hazardous substance classification program. Should Laboratory tests find this waste not in compliance with 40 CFR Part 261, customer (generator) agrees to pay for all disposal costs incurred.

SIGNED X

DATE:

1-20-10







**ORRICO**  
Oil Re-Refining

Eugene, OR:	EPA# ORQ000024941
Hoquiam, WA:	EPA# WAD988519419
Klamath Falls, OR:	EPA# ORD980980775
Leavenworth, WA:	EPA# WAH000011577
Medford, OR:	EPA# ORD987197092
North Bend, OR:	EPA# ORD980978266
Salt Lake City, UT:	EPA# UTD982589459
Spokane, WA:	EPA# WAH000011585

Date \_\_\_\_\_

1-20-10

14925

Dispatch #: 13730

Billing Address

\*Please bill corporate  
in Dallas, Texas

Check#	PO#
--------	-----

Profile Date: 12/18/09

Load Ticket # 10166120001

Above material being transported for Recycling	EPA# <u>None</u>	Total: <u>205.00 change</u>
--	------------------	-----------------------------

Customer warrants that the waste petroleum products being transferred by the above collector do not contain any contaminants including, without limitation, pesticides, chlorinated solvents at concentrations greater than 1000 PPM, PCBs at concentrations greater than 2 PPM (or 50 PPM with Analytical), or any other material classified as hazardous waste by 40 CFR part 261, Subparts C and D (implementing the federal Resource Conservation and Recovery Act), or by any equivalent state hazardous substance classification program. Should Laboratory tests find this waste not in compliance with 40 CFR Part 261, customer (generator) agrees to pay for all disposal costs incurred.

SIGNED X

DATE:

1-20-10





# Invoice

1/29/2010

309555

4150 N Suttle Road  
Portland, OR 97217-7717

**Bill To**

Burly Seal Products  
1900 Jay Ell Dr  
Richardson, TX. 75081

**Ship To**

Burly Seal Products  
1865 W D Ave, Bldg 604  
Tooele, UT

Resale #

17519043560

Option	PO #	Terms	Due Date	Ship Date	BL#	Account #
		10 Days Net	2/8/2010	1/20/2010	226900	14825

Description	Quantity	Price Each	Amount
Emulsified Oil & Water	300	0.65	195.00
Environmental & Fuel Surcharge	1	10.00	10.00

**Subtotal** \$205.00**Sales Tax (6.35%)** \$0.00**Total** \$205.00**Credits** \$0.00**Balance** \$205.00

We accept all major credit cards

A 1.5% per month service charge or a minimum of \$5.00 will be charged for invoices not paid within our terms.

Phone #

503-546-3540

Fax #

503-546-3588

E-mail

SUEE@ORRCO.BIZ

ORRCO.BIZ

Web Site





## Analysis Request/Chain of Custody

For Summit Environmental Technologies, Inc. use only

Page 1 of 1

SET No.

Client Name <b>Fuel Processors</b>		Project Name <b>January 20th suspect customers</b>		Grab	Composite	Matrix: S=Solid, L=Liquid, O=Oil SL=Sludge, A=Air, DW=Drinking Water	Preservative	Number of Containers	Analytical Parameters and Methods  <b>PCB'S</b>
Client Address <b>4150 N. Suttle Rd, Portland, OR 97217</b>		Project Address <b>ORRCD 9775. 700W, SLC, UT 84104</b>							
Client Phone No. <b>1-800-367-8894</b>		Report to <b>Holly Cantin AME LECOQUE</b>							
Client Fax No. <b>801-478-0337</b> Please Fax Results <input checked="" type="checkbox"/> <b>503-286-5027</b>		PO# <b>A2 02 26100</b>							
Client Email <b>Amel@ORRCD.BIZ</b> <b>Holly@ORRCD.BIZ / Thorpe@ORRCD.BIZ</b>		Quote No.							
Contact Person <b>Holly Cantin AME LECOQUE</b>									
Sampled by <b>Thorpe Cox / Gary Cox</b>		Check if Ohio VAP samples <input type="checkbox"/>							
#	Sample Identification	Date Collected	Time Collected						

1	Broken Arrow 1A, 1B, 1C	2-26-10	11:20AM	X	0	3	X	Add'l: Repeat Archie
2	Diamond Rental (Tooele)	2-26-10	11:40AM	X	0	1	X	
3	Burly Seal (Tooele)	2-26-10	12:25PM	X	0	1	X	
4	5 Star Quicklube (Grantsville)	2-26-10	1:20PM	X	0	1	X	
5	Upper Limit Aviation (SLC)	2-26-10	2PM	X	0	1	X	
6	Tank W-27	2-26-10	3:20PM	X	0	1	X	

1002809-01-06

Relinquished by:	Date	Time	Received by:	Date	Time
<i>Thompe Cox</i>	<i>2/26/10</i>	<i>3:20 PM</i>			
<i>Long Co</i>	<i>2/26/10</i>	<i>3:56</i>			
Received in lab by:	Date	Time	Rush Requested: _____ Days		
<i>John Anthony</i>	<i>2/27/10</i>	<i>10:00A</i>	Must be approved by lab manager		

Notes/Comments:

\* Please send results ASAP to  
AME LECOQUE Amel@omco.biz

White and yellow pages should accompany samples to the laboratory. The client retains the pink page.

28649



3/4/10 B8



March 04, 2010

**LABORATORY REPORT**

1/1

Client: ORRCO  
Address: 4150 N. Suttle Road  
Portland, OR 97217

Date Collected: 02/26/2010  
Date Received: 02/27/2010  
Project #: Jan 20 Suspect  
Client ID #: Burly Seal  
Laboratory ID #: 1002809-03  
Matrix: Liquid  
Analyst: AKE

<u>Parameter</u>	<u>Method</u>	<u>Results</u>	<u>Date of Analysis</u>
Aroclor - 1016/1242	8080	12000ppm	03/01/2010
Aroclor - 1221	8080	<1.0ppm	03/01/2010
Aroclor - 1232	8080	<1.0ppm	03/01/2010
Aroclor - 1248	8080	<1.0ppm	03/01/2010
Aroclor - 1254	8080	8800ppm	03/01/2010
Aroclor - 1260	8080	<1.0ppm	03/01/2010

12000  
8800  
-----  
20800

Laboratory Manager: \_\_\_\_\_

A handwritten signature in cursive script, appearing to read "R. J. Hilas", written over a horizontal line.